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Attorneys for Defendants
STATE OF HAWAI'I DEPARTMENT
OF PUBLIC SAFETY; TOMMY
JOHNSON, Director, Hawai'i
Department of Public Safety; and GAVIN
TAKENAKA, Health Care Director,
Hawai'i Department of Public Safety,
Corrections Division

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI'I

DONNA OPULENTO, on behalf of
the Estate of JESSICA FORTSON;
FRANK HAMPP, and JOSEPH TUI,
individually and on behalf of all
others similarly situated,

Plaintiff,

v.

STATE OF HAWAI'I
DEPARTMENT OF PUBLIC
SAFETY; TOMMY JOHNSON,
Director, Hawai'i Department of
Public Safety; GAVIN TAKENAKA,

CIVIL NO. 19-00315 RT

STIPULATION FOR DISMISSAL WITH
PREJUDICE AS TO ALL CLAIMS AND
PARTIES, AND ORDER

The Honorable Rom Trader

No Trial Date

Health Care Director, Hawai‘i
Department of Public Safety,
Corrections Division; DOES 1-30,

Defendants.

STIPULATION FOR DISMISSAL WITH PREJUDICE
AS TO ALL CLAIMS AND PARTIES

IT IS HEREBY STIPULATED pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and Rule 41.1 of Local Rules of Practice for the United States District Court for the District of Hawaii, by and between the parties hereto through their respective counsel, that this action be and hereby is dismissed with prejudice. The agreed-upon attorneys’ fees and costs were previously paid to counsel for the Plaintiffs. All remaining claims and parties are dismissed. All parties who have appeared in this action have signed this stipulation.

DATED: Honolulu, Hawai‘i, September 9, 2025.

STATE OF HAWAII

ANNE E. LOPEZ

Attorney General of Hawai‘i

/s/ Kendall J. Moser

SKYLER G. CRUZ

KENDALL J. MOSER

Deputy Attorneys General

Attorneys for Defendants

STATE OF HAWAI‘I DEPARTMENT
OF PUBLIC SAFETY, TOMMY
JOHNSON, and GAVIN TAKENAKA

DATED: Honolulu, Hawai‘i, September 9, 2025.

/s/ Eric A. Seitz

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Attorneys for Plaintiffs

DONNA OPULENTO, on behalf of
the Estate of JESSICA FORTSON, FRANK
HAMPP, and JOSEPH TUI, individually
and on behalf of all others similarly situated

APPROVED AS TO FORM:

DATED: September 10, 2025, Honolulu, Hawai‘i.



Rom A. Trader

Rom A. Trader

United States Magistrate Judge

Civil No. 19-00315 RT; Donna Opulento, et al. v. State of Hawai‘i Department of Public Safety, et al.; Stipulation for Dismissal with Prejudice as to all Claims and Parties, and Order